

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

CORRIGENT CORPORATION,
Plaintiff,
v.
CISCO SYSTEMS, INC.,
Defendant.

Civil Action No. 6:22-cv-396-ADA

JURY TRIAL DEMANDED

DEFENDANT'S MOTION TO ENTER FINAL JUDGMENT

Pursuant to Federal Rule of Civil Procedure 58, Defendant Cisco Systems, Inc. (“Cisco”) respectfully requests that the Court enter the proposed Final Judgment attached hereto. In support of this Motion, Cisco states the following:

1. This case was recently tried to a jury from January 13 to January 16, 2025.
2. On January 16, 2025, the Court granted Cisco’s Rule 50(a) motion for judgment as a matter of law of no infringement.
3. Cisco conferred with Plaintiff about this motion. Plaintiff agrees to the form of the Proposed Final Judgment, but objects to entry of judgment against it and reserves all rights to raise any issues for appeal (other than the form of the judgment).
4. Cisco further conferred with Plaintiff about the need for a reasoned decision on the Court’s § 101 rulings on Plaintiff’s U.S. Patent No. 6,957,369 and U.S. Patent No. 7,113,485 (Dkt. 294, Dkt. 333 at 2) in view of Cisco’s understanding that Plaintiff intends to appeal the Court’s ruling. Consistent with other cases where the Court has indicated that it intended to provide additional analysis for the Federal Circuit appeal,

Cisco respectfully requests the Court provide an explanation of the § 101 rulings to facilitate appellate review. *See, e.g., WSOU Investments LLC v. Google LLC*, No. 6:20-cv-00578, Dkt. 56 (Court Order Granting Motion for Indicative Ruling); *Carbyne Biometrics, LLC v. Apple Inc.*, No. 1:23-cv-324, Dkt. 388 (Court's indication at February 7, 2025 Pretrial Conference that it would provide written rulings on § 101 and on standing and noting on the docket that a written order is forthcoming); *see also, Realtime Data LLC v. Reduxio Sys., Inc.*, 831 F. App'x 492 (Fed. Cir. 2020) (remanding § 101 decision for further explanation from the district court). Corrigent does not join in this request.

WHEREFORE, Cisco respectfully requests that the Court enter the proposed Final Judgment attached to this Motion.

Dated: February 10, 2025

Respectfully submitted,

/s/ Brian A. Rosenthal

Michael E. Jones
State Bar No: 10929400
mikejones@potterminton.com
Shaun W. Hassett
State Bar No. 24074372
shaunhassett@poterminton.com
POTTER MINTON, P.C.
102 N. College Ave., Suite 900
Tyler, Texas 75702
Telephone: (903) 597-8311
Facsimile: (903) 593-0846

Brian A. Rosenthal
brosenthal@gibsondunn.com
Katherine Dominguez (*pro hac vice*)
kdominguez@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000
Facsimile: 212.351.4035

Stuart M. Rosenberg (*pro hac vice*)
srosenberg@gibsondunn.com
GIBSON, DUNN & CRUTCHER LLP
310 University Avenue
Palo Alto, CA 94301-1744
Telephone: 650.849.5300
Facsimile: 650.849.5333

Attorneys for Defendant Cisco Systems, Inc.